

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CONSERVATION FORCE, Robert VIDEN,
Peter HEFFERAN, Craig DEAR, Vincent James
SPINELLA, Richard NORDLING, GARDEN
STATE TAXIDERMIST ASSOCIATION, and
John JANELLI, d/b/a Janelli Taxidermy,

Plaintiffs,

v.

Christopher PORRINO, Acting Attorney General
of the State of New Jersey, and Bob MARTIN,
Commissioner of the New Jersey Department
of Environmental Protection,

Defendants.

Civ. No. 16-CV-_____

DECLARATION OF
ROBERT VIDEN, JR.

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I, Robert Viden, Jr., under penalty of perjury pursuant to 28 U.S.C. § 1746, make the following declaration in support of Plaintiffs' Motion for a Preliminary Injunction.

1. I make this Declaration based upon my personal, first-hand knowledge.
2. I am a resident of New Jersey.
3. I am an international safari hunter with significant experience hunting in Africa.
4. I have hunted the Big Five and recently returned from a Cape Buffalo hunt. My hunt was licensed by the relevant South African authority, and I had all my permits and licenses. I obtain all the necessary paperwork for all my hunts, including U.S. Fish and Wildlife Service permits, if needed to import the trophy from the hunt.

5. I understand New Jersey recently passed a law, S977, which prohibits the import, export, transport, and possession of elephant, leopard, lion, and rhino parts and hunting trophies, even if the hunt is fully licensed and the hunter has a valid U.S. import permit. Enforcement of this law will damage my personal and business interests.

6. I have the present firm intent to return to Africa in the near future with my grandson. This will be his first trip. I look forward to sharing this experience with him because big game hunting is an activity that I love, which has been a big part of my life. I want to pass down this tradition, which I believe ultimately benefits the game by raising revenue for anti-poaching and providing incentives for the rural communities who live side by side with wildlife.

7. I have personally seen the impact of poaching. The funds from my hunts and the anti-poaching provided by hunting operators like those I use helps combat poaching of the Big Five and other species.

8. I have also personally seen the death and damage that dangerous game like elephant and lion do to rural communities in Africa. The funds from my hunts and the engagement of hunting operators helps reduce the conflict between people and wildlife.

9. Because of my safari experience, I also, personally and directly, help support rural people in Africa. An experience with a young boy during one of my first safari hunts caused me to start Operation Footsteps. This program brings shoes to children without any, and helps protect them from disease as a result of parasites entering the body through the feet. The One-Shot Hunt Club of South Africa has adopted Operation Footsteps as part of its humanitarian service to school children in South Africa, and the program has been running for years. I would not have begun the program if it was not for my love of safari hunting and the children I have met on hunts.

10. A trophy is a critical part of the hunt. It represents the experience, the game, and my love for the sport. If I cannot bring back the trophy, I will be less likely to hunt.

11. If S977 stays in effect, my grandson and I may well cancel or postpone the hunt.

12. If I had not hunted due to bans like S977, the anti-poaching and community benefits that I personally contributed to would not exist. If S977 reduces demand among hunters, which I think it will, then many anti-poaching, community, and conservation benefits will be lost.

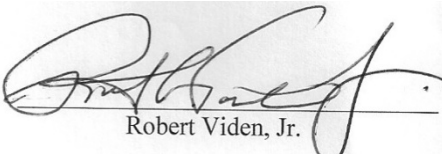
13. S977 damages my personal interests because it stops me from doing something I love and takes away my right to possess a lawfully hunted and imported trophy. Enforcement of this ban will diminish my enjoyment of the trip with my grandson or cause me to cancel that trip.

14. This ban also damages my business and livelihood. I own and operate a retail sports store in New Jersey specializing in firearms, archery products, and hunting supplies. I sell firearms and bows used in Big Five safaris. Enforcement of S977 will reduce my business income because, like me, fewer Big Five hunters will be willing to hunt. Fewer hunters means decreased demand for the products sold at my store, and reduced revenue for my family.

15. My customers include New Jersey residents who hunt elephant, leopard, lion, and rhino. Reduced demand due to the ban on trophies will discourage my customers from hunting. I will lose invaluable business and personal relationships. My family has run this store since 1965, and the negative effects of S977 on long-standing customers will injure not only my business but also my friends.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 6 , 2016



Robert Viden, Jr.